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U.S. District Court
Northern District of Illinois

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

① Chicago Tribune Newspaper

② Timothy Doyle Young

vs.

07CV 6566

JUDGE KENNELLY

MAGISTRATE JUDGE COX

United States

Civil Complaint

① The United States has prevented correspondence through the U.S. Mail with first class postage attached between inmate Young and the Chicago Tribune Newspaper.

② The correspondence concerns facts about abuses at the U.S.P.-ADX Federal Supermax Prison ("Gitmo of the Rockies") supported by BOP records and/or public records.

③ This was done with the sole intent of illegally suppressing

verifiable facts that are a matter of public concern and done in violation of the governing rules and regulations, 28 CFR § 540, PS 5265-11, etc.

(4) The letters were addressed as illustrated in the Appendix had a forty-one cent stamp affixed, marked as "Special Mail", and rejected without reason, explanation, or a rejection notice.

(5) These acts and inactions violate: F.O.I.A.-P.A., the First and Fifth Amendments.

Jurisdiction

- a.) 28 USC § 1331.
- b.) 28 USC §§ 2201-02.
- c.) 28 USC § 1361.
- d.) 18 USC § 3626.
- e.) 5 USC § 552.
- f.) 5 USC § 552a.
- g.) 5 USC §§ 701 et seq.
- h.) F.R.Civ.P. #65.

Relief

- A. Declaration that these acts are illegal and/or unconstitutional.
- B. Punitive damages.
- C. Nominal damages.
- D. Immediate injunction against the U.S. from preventing correspondence with the Media.
- E. All costs.
- F. Any other relief as the Plaintiffs may be entitled to.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Tu Y
Nov. 14, 2007. Pro Se

Timothy Doyle Young #60012-001
USP-Max-ADX
PO Box 8500
Florence, CO 81226

"Legal Mail -
Open only in
presence of inmate."

Three

Appendix

① Chicago Tribune Newspaper
Editor

435 N. Michigan Ave. 9-4-07
Chicago, IL 60611

② Chicago Tribune

Mr. Cohen, Attorney
Legal Dept.

9-7-07

435 N. Michigan Ave.
Chicago, IL 60611

③ Chicago Tribune

Julia Keller, Journalist 9-12-07

435 N. Michigan Ave.
Chicago, IL 60611